1		HONORABLE STANLEY A. BASTIA
2 3 4 5 6 7 8 9	Timothy D. Anderson HAMES, ANDERSON, WHITLOW & 601 W. Kennewick Avenue Kennewick, WA 99336 Telephone: (509) 586-7797 R. Bruce Johnston JOHNSTON LAWYERS, P.S. 2701 First Avenue, Ste. 340 Seattle, WA 98109 Telephone: (206) 866-3230	O'LEARY
11 12	EASTERN DISTR	ES DISTRICT COURT RICT OF WASHINGTON AND DIVISION
13 14	POCO, LLC,	: CASE NO. 4:14-cv-05106-EFS
15 16 17 18	Plaintiff, vs. FARMERS CROP INSURANCE ALLIANCE, INC.,	: JOINT MOTION FOR : EXTENSION OF DISPOSITIVE : MOTION DEADLINE : 10/28/2015
20	Defendant.	: Without Oral Argument
21	Plaintiff POCO, LLC and Defendant Farmers Crop Insurance Alliance, Inc. jointly respectfully request that the Court extend the deadline to file dispositive motions two weeks, currently set for October 30, 2015, to November 13, 2015.	
22 23 24		
25	The requested extension will not	affect other deadlines within the current
	Scheduling Order (ECF No. 16) or the J	January 13, 2016 date that the parties have
	JOINT MOTION TO EXTEND DEADLINE - 1	JOHNSTON LAWYERS, PS

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1	discussed with chambers for oral argument for dispositive motions. The parties	
2	respectfully request that the court expedite the hearing of this motion for the reasons	
3	lespectrumy request that the court expedite the hearing of this motion for the reasons	
4	included in the accompanying Motion to Expedite.	
5		
6	Respectfully submitted,	
7	/s/ R. Bruce Johnston	
8	R. Bruce Johnston, WSBA #45356	
9	Emanuel F. Jacobowitz. WSBA # 39991	
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15	/s/ Timothy D. Anderson	
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21	Admitted Pro Hac Vice:	
22	/s/Thomas C. James, Jr.	
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JOINT MOTION TO EXTEND DEADLINE - 3

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